U.S. Comments on Draft Texts of the Code Chapter 2.4.8 (Scrapie) of the OIE International Animal Health Code

(Submitted to OIE on May 8, 2002)

Thank you for the opportunity to review the latest draft of the Code Chapter on Scrapie (Chapter 2.4.8). Please kindly consider the following comments:

Articles 2.4.8.3 4) c), 2.4.8.74 2) g)

We noticed that the recommended age for surveillance of and submitting samples from sheep or goats showing neurological signs has been reduced from 18 to 12 months. This change is neither efficient nor effective and will result in a waste of resources to any national scrapie program. Sheep and goats that young do not exhibit signs of scrapie, and therefore, in spite of submitting samples from such animals, the added benefit to any scrapie surveillance program will be minimal if any. We advise that the minimum age be returned to 18 months.

Articles 2.4.8.4 1) c), 2.4.8.7 1) c)2.4.8.8 1) c) and 2.4.8.9 1) c)

Where ever possible clarity in the text should be made to minimize any doubt and confusion as to the intent of the recommendation. Therefore, for the above listed Articles, and as previously suggested, the language in this Section is inserted to make it clear that any product derived from such animals be destroyed and prevented from entering the feed chain.

Suggested change:

c) affected sheep and goats are slaughtered and completely destroyed, thus ensuring that any product derived from such animals does not enter the feed chain.

Article 2.4.8.9 2)

As in our previously submitted comments, we do not recommend that the statement "have been kept since birth in *establishments* in which no *case* of scrapie had been confirmed during their residency" that was part of this article be omitted. The consensus among scrapie experts is that embryos may pose a risk for transmitting scrapie. The deletion now allows scrapie-exposed animals to be embryo donors. Therefore, we propose that it be re-inserted and Article 2.4.8.9 2) read as follows:

2) the donor animals:

a) are permanently identified to enable trace back to their *establishment* of origin;

- b) have been kept since birth in *establishments* in which no *case* of scrapie had been confirmed during their residency;
- c) showed no clinical signs of scrapie at the time of embryo/oocyte collection

We hope you will find these comments useful. Thank you again for considering our comments and for the opportunity to review this Chapter.

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